



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

April 20, 2020

**BY ECF AND EMAIL**

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Trevon Gross*, 15 Cr. 769 (AJN)**

Dear Judge Nathan:

The Government respectfully submits this letter in response to the Court's April 20, 2020 Order, in which the Court ordered that the Government respond by 4:30 PM to oppose the defendant's request for immediate release. The Government has conferred with a representative of the Bureau of Prisons ("BOP") at USP Canaan, and the answers to the Court's questions are as follows:

- Trevon Gross is currently being held at the camp at USP Canaan, for which the entire camp is, as the BOP describes, "under quarantine," meaning, there is no movement of individuals into or out of the camp, unless the individual is being released. The camp will remain "quarantined" until April 22.
- If the Court were to expressly order Gross released as of May 2, 2020, as a precaution, the BOP would move Gross to the "Quarantine Unit," in which no one would enter or leave the cell. Gross would be in a double cell, and may have another inmate with him. Gross would have no exposure to prison staff other than with the prison staff having full PPE gear.
- Inmates are not automatically tested for COVID-19 before or after being placed into quarantine unless they exhibit symptoms.

Respectfully submitted,

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cc: Kristen Santillo (by ECF and email)